

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO PLAINTIFFS:</b>  <b>All Wave II TVT Cases</b>  <b>Jean Fleck v. Ethicon, Inc., et. al. Case No. 2:12-cv-01681</b>  <b>Phyllis Martin v. Ethicon, Inc., et. al. Case No. 2:12-cv-02029</b>  <b>Ramona Phillips v. Ethicon, Inc., et. al. Case No. 2:12-cv-02143</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO EXCLUDE THE GENERAL  
OPINION TESTIMONY OF JANET E. TOMEZSKO, M.D.**

PLEASE TAKE NOTICE that on \_\_\_\_\_, or as soon thereafter as the motion may be heard in the above entitled Court located at Robert C. Byrd United States Courthouse, 300 Virginia Street, East, Suite 2400, Charleston, West Virginia 25301, Plaintiffs, will and do move this Court for an order granting their request to exclude the testimony of Janet E. Tomezsko, M.D., ("Dr. Tomezsko") in the above-captioned matters. Plaintiffs seek to exclude the testimony of Dr. Tomezsko as set forth in full in the Memorandum in Support of Plaintiffs' Motion to Exclude the Testimony of [Dr. Tomezsko] ("Memorandum") filed contemporaneously with this Motion, along with the exhibits attached thereto.

This motion will be made and is based on this Notice of Motion and Motion, the Memorandum, and upon such other matters as may properly come before the Court at the hearing hereof.

Date: July 21, 2016

By: /s/ Fidelma L. Fitzpatrick  
Fidelma L. Fitzpatrick  
Motley Rice LLC  
321 South Main Street  
Providence, RI 02903  
Phone: (401) 457-7700  
Fax: (401) 457-7708  
[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)

Fred Thompson, III  
Motley Rice LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
Phone: (843) 216-9000  
Fax: (843) 216-9450  
[fthompson@motleyrice.com](mailto:fthompson@motleyrice.com)

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 21, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/Fidelma L. Fitzpatrick  
Fidelma L. Fitzpatrick  
Motley Rice LLC  
321 South Main Street  
Providence, RI 02903  
Phone: (401) 457-7700  
Fax: (401) 457-7708  
[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)

Fred Thompson, III  
Motley Rice LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
Phone: (843) 216-9000  
Fax: (843) 216-9450  
[fthompson@motleyrice.com](mailto:fthompson@motleyrice.com)

*Counsel for Plaintiff*